



**REPLY DECLARATION OF ELAINE M. GUERARD,  
JULIE A. CANNY, AND MARILYN C. DEVITO**

**ATTACHMENT 2**

January 25, 2001

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa. 17120

Dear Mr. McNulty:

Per Verizon PA's Carrier-to-Carrier Guidelines in Docket No. P-00991643, attached please find Verizon PA's CLEC aggregate performance report for December, 2000 results.

Through an internal process designed to review the accuracy of data furnished in the reports, Verizon PA has identified the issues detailed in Attachment A.

Metrics OR-6-03, OD-2, OR-7-01, OR-8-01 and OR-9-01 remain Under Development (UD).

Also, Verizon PA will be changing the retail analog used for metric PO-1-04. This metric measures response time for the Product and Service Availability pre-order query, and the Commission-mandated standard is "parity with retail." Because of the settlement of a dispute proceeding brought by the CLECs at the FCC, the transaction for CLECs was significantly modified to provide CLECs with more information than is provided to Verizon PA retail. To be consistent with the transaction change on the wholesale side, Verizon PA is therefore changing the analog retail transaction so that it contains the same information provided to the CLECs. This change in the retail analog is necessary to conform to the parity standard. This change does not require a modification to the Carrier -to-Carrier Guidelines. Verizon PA will notify the Commission upon implementation of this change.

Please note that the Verizon PA retail data in the attached filing is proprietary and should be treated accordingly.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,



**REPLY DECLARATION OF ELAINE M. GUERARD,  
JULIE A. CANNY, AND MARILYN C. DEVITO**

**ATTACHMENT 3**

Ronald F. Weigel  
Director  
Government Relations



Verizon Pennsylvania  
Strawberry Square, 4th Floor  
Harrisburg, PA 17101

Phone 717.777.4813  
Fax 717.777.5610  
ronald.f.weigel@verizon.com

March 26, 2001

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa. 17120

Dear Secretary McNulty:

Per Verizon PA's Carrier-to-Carrier Guidelines in Docket No. P-00991643, attached please find Verizon PA's CLEC aggregate performance report for February, 2001 results. Also attached, is a separate affiliate aggregate report. In addition, attached to this filing are CD-ROMs containing all raw data used in the generation of the aggregate report. This data is being provided to both the Commission and KPMG Consulting in compliance with the Commission's directive in Docket M-00001453.

Through an internal process designed to review the accuracy of data furnished in the reports, Verizon PA has identified data issues with some of the metrics. These issues are detailed in Attachment A.

Metric OD-2 remains Under Development (UD). Metrics BI-6-02, BI-7-01, BI-7-02 and BI-8-02 are reported as Under Review (UR). The calculation for these metrics is being changed to capture absolute values which will provide a more accurate analysis of performance.

Please note that the Verizon PA retail data in the attached filing is proprietary and should be treated accordingly.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,

A handwritten signature in cursive script, reading "Ronald F. Weigel".

cc: KPMG Consulting  
Mr. Ron Lee  
Floor 24  
1865 Market Street  
Philadelphia, PA. 19103

CLECs Receiving Reports

## Attachment A

BI-4-01 BI-4-02 BI-5-01	The Carrier-to-Carrier guidelines require these metrics to be reported on a one month delay basis. Verizon is reporting this metric on a current month basis.
BI-3	Calculations are being changed to report absolute values.
OR-6-03	This metric measures ordering accuracy and requires analysis of all local service requests within the parameters be included in the calculation. Verizon PA continues to aggressively develop this capability. In the interim, Verizon PA is reporting this metric based on a sampling, as is done with other order accuracy metrics.
PR-6-03 PR-6-01	These metrics inadvertently include some DSL orders in the POTS category. This classification is being corrected.
PR	Varied provisioning metrics currently include record only orders that temporarily discontinue service due to non-payment and the associated order to restore service (SNP/Restore). Such orders do not include provisioning activity. Verizon is developing edits to exclude such orders.
PR	For varied provisioning metrics for special service orders, Verizon is implementing an edit to ensure only special service circuits are included. Verizon will use the Record Issue Date (RID) to determine if the circuit requires design and is therefore categorized as a special.
PR-6-01	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
MR-2-02, MR-2-03, MR-2-05	The attached CLEC aggregate report understates the number of UNE DSL loops by 751 lines. These metrics, at the aggregate level, miss the standard and it is believed they would continue to miss the standard if corrected. Therefore, the numbers on the reports, at the CLEC specific level, will be used for remedy calculations. Additionally, the Verizon affiliate report is also missing the equivalent line count.
MR	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
PR-1-10 PR-2-10, 11	The Carrier-to-Carrier Guidelines permit the exclusion of orders where the customers requested due date is greater than or less than the standard available appointment interval. Verizon is developing the edit to implement this exclusion.

Bell Atlantic - Pennsylvania, Inc.  
Strawberry Square, Fourth Floor  
Harrisburg, Pennsylvania 17101  
717 777-4513 Fax 717 777-5610  
E-Mail: ronald.f.weigel@BellAtlantic.com

Ronald F. Weigel  
Director  
Government Relations



April 26, 2000

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
North Street & Commonwealth Avenue  
North Office Building - Room B-20  
Harrisburg, Pa. 17120

RECEIVED  
00 APR 26 PM 4:01  
PA.P.U.C.  
SECRETARY'S BUREAU

Dear Mr. McNulty:

Per BA-PA's January 31, 2000 Interim Performance Assurance Plan compliance filing in Docket No. P-00991643, attached please find BA-PA's CLEC aggregate performance report for March 2000 results.

Please note that the BA-PA retail data in the attached filing is proprietary and should be treated accordingly.

As stated in the Interim Performance Assurance Plan (p.2), it will take BA-PA a number of months to implement all of the disaggregated measurements required by the Commission. The attached report for March contains reports on hundreds of additional metrics that were reported as Under Development (UD) in the February report. While this increase was substantial, it will still be several months before all metrics can be implemented and reported.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,

*R. F. Weigel*



## Attachment A

BI-3	Calculations are being changed to report absolute values.
BI-4-01 BI-4-02 BI-5-01	The Carrier-to-Carrier guidelines require these metrics to be reported on a one month delay basis. Verizon is reporting this metric on a current month basis.
GE-2-01	This metric measures requests for access to poles, ducts, conduit and rights-of-way. Verizon has found that it is not appropriately capturing the date the request was initially received.
MR	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
OR	On all ordering metrics for the "specials" product set, Verizon is inadvertently including dark fiber orders. An edit is being developed to correct this inclusion.
OR-6-03	This metric measures ordering accuracy and requires analysis of all local service requests within the parameters be included in the calculation. Verizon PA continues to aggressively develop this capability. In the interim, Verizon PA is reporting this metric based on a sampling, as is done with other order accuracy metrics.
PO-1	An edit is being developed to correct the inclusion of enview transactions that have a "0" response time.
PO-2-03	For Electronic Bonding (EB) Verizon is incorrectly posting a formula in the cell on the C2C report rather than the appropriate value.
PR	Varied provisioning metrics currently include record only orders that temporarily discontinue service due to non-payment and the associated order to restore service (SNP/Restore). Such orders do not include provisioning activity. Verizon is developing edits to exclude such orders.
PR	For varied provisioning metrics for special service orders, Verizon is implementing an edit to ensure only special service circuits are included. Verizon will use the Record Issue Date (RID) to determine if the circuit requires design and is therefore categorized as a special.
PR	On varied Provisioning metrics, Verizon has determined that its systems are not capturing 100% of all missed appointment cause codes.
PR	For non-dispatch platform orders that flow through, a table entry is incorrectly assigning some orders as dispatch for metrics calculation purposes.
PR-1-10, 11 PR-2-10, 11	The Carrier-to-Carrier Guidelines permit the exclusion of orders where the customers requested due date is greater than or less than the standard available appointment interval. Verizon is developing the edit to implement this exclusion.
PR-1-10, 11 PR-2-10, 11	Verizon is inadvertently capturing ASR disconnect orders as dispatch orders rather than non-dispatch orders.
PR-6-01	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.

Bell Atlantic - Pennsylvania, Inc.  
Strawberry Square, Fourth Floor  
Harrisburg, Pennsylvania 17101  
717 777-4813 Fax 717 777-5610  
E-Mail: ronald.f.weigel@BellAtlantic.com

Ronald F. Weigel  
Director  
Government Relations



May 25, 2000

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
North Street & Commonwealth Avenue  
North Office Building - Room B-20  
Harrisburg, Pa. 17120

RECEIVED  
00 MAY 25 PM 3:42  
PA.P.U.C.  
SECRETARY'S BUREAU

Dear Mr. McNulty:

Per BA-PA's January 31, 2000 Interim Performance Assurance Plan compliance filing in Docket No. P-00991643, attached please find BA-PA's CLEC aggregate performance report for April, 2000 results.

Please note that the BA-PA retail data in the attached filing is proprietary and should be treated accordingly.

As stated in the Interim Performance Assurance Plan (p.2), it will take BA-PA a number of months to implement all of the disaggregated measurements required by the Commission. The attached report for April provides results for many metrics previously reported as Under Development (UD). It will still be several months before all metrics will be implemented.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,

*R. F. Weigel*

May 25, 2001

Attachment A

PR	For varied PR metrics, Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
BI-2	Verizon has found that some records in the metrics data base repository are being overlaid by subsequent files where key information is identical.
OR	For varied ordering metrics, Verizon has found that its metrics systems were incorrectly identifying (for metrics reporting) EELs and private line services.
BI	Varied billing metrics inadvertently include some CLEC test data.
OR-1	The Carrier-to-Carrier guidelines allow resent confirmations that are resent for reasons other than Verizon error to be excluded. Verizon is developing the capability to sort resent confirmations by reason and apply the exclusion as required.
NP-1-01 NP-1-02 NP-1-03	Verizon has determined that the data for these metrics for the months of January on, inadvertently was capturing some trunks that were only carrying IXC traffic.
OR-1,2	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
MR-2-01 MR-4 MR-5-01	Verizon is inadvertently including some Verizon Wireless trunks in the retail calculation.
OR-4-01 OR-4-02	Verizon needs to implement an edit to exclude Service Order Processor (SOP) scheduled downtime.
BI-4-01 BI-4-02 BI-5-01	The Carrier-to-Carrier guidelines require these metrics to be reported on a one month delay basis. Verizon is reporting these metrics on a current month basis.
BI-4-01	A data calculation error has been found in the denominator for this metric. The metrics storage database has been inadvertently overwriting some transactions, which would likely lower the number or records submitted.
PR-4-02	Verizon is incorrectly reporting the denominator for this metric as "Count of orders completed for product group." The denominator should be "Count of orders missed for Verizon reasons, by product group."
PR-4-04	Verizon has inadvertently not been excluding facility misses from the denominator in the calculation for this metric.
PR-5-01 PR-5-02 PR-5-03	Verizon is inadvertently not separating dispatch verses non-dispatch orders for some products within these metrics.
PR-6-01	Verizon is inadvertently not including Hi-Capacity circuits in the denominator for this metric.
OR-6-03	This metric measures ordering accuracy and requires analysis of all local service requests within the parameters be included in the calculation. Verizon PA continues to aggressively develop this capability. In the interim, Verizon PA is reporting this metric based on a sampling, as is done with other order accuracy metrics.
PR-1, 2,3,4,5,8	Varied provisioning metrics currently include record only orders that temporarily discontinue service due to non-payment and the associated order to restore service (SNP/Restore). Such orders do not include provisioning activity. Verizon is developing edits to exclude such orders.



**REPLY DECLARATION OF ELAINE M. GUERARD,  
JULIE A. CANNY, AND MARILYN C. DEVITO**

**ATTACHMENT 4**



April 1, 2001

Dear Recipient of PA Carrier-to-Carrier Performance Reports:

Verizon is pleased to announce the availability of an 800 number for you to call if you have questions regarding your Pennsylvania Carrier-to-Carrier Performance Reports. In order to better serve our Wholesale customers in providing timely responses to Wholesale metric issues, Verizon has established a Performance Report Help Line. Inquiries accepted on this line will address metrics associated with Verizon-PA's Carrier-to-Carrier Performance Reports. The Help Line number is **800-959-9995**.

General Wholesale and Verizon questions should continue to be directed to your Verizon Account Manager. Calls pertaining to Pre-Order, Ordering, and Maintenance system and transaction inquiries should continue to be directed to the Wholesale Customer Care Center (formerly the Bell Atlantic Systems Solutions Help Desk "BASSHD").

In order for Verizon to best serve you on the Help Line, you will be required to provide the following information:

- Your name and reach number
- Your company name
- Your company AECN, RSID, ACNA, CCNA or OCN
- Report Title, Month, Carrier-to-Carrier Guideline Metric Name and Number, and Geographic State
- Detailed description of inquiry
- Email address

The hours of operation are Monday through Friday, 8:00 a.m. to 5:00 p.m. EST. If a call coordinator is unavailable during these hours, VoiceMail will be provided and acknowledged promptly. During non-business hours, VoiceMail will be acknowledged by the next business day.

If after normal business-to-business efforts have taken place to resolve the metric issue and you are not satisfied with the resolution, three levels of escalation are available to you:

Escalation Level	Contact	Title	Contact Number
Level 1	Pamela Hunt	Manager	301-236-3894
Level 2	Renie Spriggs	Director	703-974-4311
Level 3	Thomas Sautto	Executive Director	973-649-7025

Verizon looks forward to working cooperatively to resolve all your metric inquiries.

Respectfully,

Renie Spriggs  
Director - Wholesale Performance Assurance